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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: NOTICE OF EX-PARTE COMMUNICATION

In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45; In the Matter of Lifeline and Link Up, WC Docket No. 03-109; In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; and In the Matter of Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 12-23.

Dear Ms. Dortch:

On August 29th, Cathy Carpino, Jeff Mondon, Ramiz Rafeedie, Mary Jo Peed, and I (of AT&T), and Jonathan Lakritz, Cherrie Conner, Benjamin Schein, and Sindy Yun (of the California Public Utilities Commission ("CPUC")) met (via telephone) with Kimberly Scardino and Jonathan Lechter of the FCC's Wireline Competition Bureau. The purpose of the call was to discuss the CPUC's ongoing implementation of the FCC's comprehensive lifeline reform order released in February, 2012. Specifically, AT&T and the CPUC requested the FCC's guidance on the CPUC's intentions to provide AT&T with end-user certifications at the end of the month, and whether AT&T would be in violation of the FCC's rules if it enrolled customers in advance of actually receiving copies of the end-user certifications from the CPUC's Lifeline administrator after the CPUC's recertification waiver expires on December 1, 2012. FCC staff confirmed that, post-waiver, it would be reasonable for AT&T to enroll customers in advance of actually receiving end-user certifications if the delay was minimal.

During the course of this discussion, AT&T raised an argument made in a pending Petition for Reconsideration filed by the US Telecom Association.¹ Specifically, AT&T indicated that, but for this formalistic requirement in the FCC's rules, it was not otherwise interested in receiving copies of end-user certifications collected by the CPUC's Administrator, and that the assurances by the Administrator that such certifications were in fact collected should be sufficient for any eligible

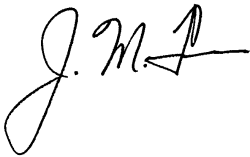
¹ United States Telecom Association, *Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 03-109, and 12-23, and CC Docket No. 96-45 (filed April 2, 2012).

telecommunications carrier (“ETC”). AT&T encouraged the FCC to act on the Petition for Reconsideration to relieve ETCs/Administrators of this burdensome requirement.

In accordance with the Commission’s rules, this letter is being filed electronically in the above-referenced dockets via the FCC’s Electronic Comments Filing System.

Should you have any questions regarding the above or the attached, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. L." with a stylized flourish at the end.

Attachment

Cc: Kimberly Scardino
Jonathan Lechter